



CRAW-KAN TELEPHONE COOPERATIVE INC.

200 N. Ozark • P. O. Box 100 • Girard KS. 66743

620-724-8235 • Fax 620-724-4099

JERRY R. JAMES

•GENERAL MANAGER•

Date: February 25, 2009

ELECTRONICALLY FILED

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street S. W., Suite TW-A325
Washington, D.C. 20554

RE: Certification of CPNI Filing, March 1, 2009 for 2008
FCC Docket EB 06-36
Form 499 Filer ID: 801303
801305

Dear Ms. Dortch:

Pursuant to Section 64.2009(e) of the FCC rules, please find attached Craw-Kan Telephone Cooperative, Inc., (499 Filer ID: 801303) and Craw-Kan Communications Systems, Inc., (499 Filer ID: 801305) 2008 CPNI certification with an accompanying statement. The documents are submitted in accordance with the directives set forth in the FCC's *Public Notice*, DA 09-9, EB Docket No. 06-36, released January 7, 2009.

Please contact me with any questions or concerns.

Sincerely,

Wilda Pentola, President

CC: Best Copy and Printing, Inc. (1)





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Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 25, 2009

Name of company(s) covered by this certification:

Craw-Kan Telephone Cooperative, Inc, **499 Filer ID 801303**

Craw-Kan Communication Systems, Inc. **499 Filer ID 801305**

Name of signatory: Wilda Pentola

Title of signatory: President

I, Wilda Pentola, certify that I am an officer of the companies named above, and acting as an agent of the companies, that I have personal knowledge that the companies have established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the companies' procedures ensure that the companies are in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The companies have not taken any actions against data brokers in the past year.

The companies have not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed Wilda Pentola





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Attachment A

Statement Concerning Procedures Ensuring Compliance with CPNI Rules

The operating procedures of Craw-Kan Telephone Cooperative, Inc., (Form 499 Filer ID No. 801303) and Craw-Kan Communication Systems, Inc., (Form 499 Filer ID No. 801305) hereinafter the "Company" ensures that the Company complies with Part 64, Section 2001 *et seq.* of the FCC rules governing the use of Customer Proprietary Network Information ("CPNI").

The Company has established a system by which the status of a customer's approval for the use of CPNI can be clearly established prior to the use of CPNI. The Company relies on the involvement of its supervisor/management to ensure that no use of CPNI is made without review of applicable rules and law.

The Company trains its personnel regarding when they are authorized to use CPNI, as well as when they are not authorized to use CPNI. Personnel must sign a verification form stating they have completed training and understand that any infraction of the CPNI procedures can result in disciplinary action being taken against them.

The Company has an express disciplinary process in place for personnel who create or are involved in an infraction of the CPNI rules and the Company's CPNI Operating Procedures.

The Company maintains records of its own sales and marketing campaigns via a log. These records include a description of each campaign, the specific CPNI used in the campaign, and the products and services that were offered as a part of the campaign. The Company has a supervisory review process for all outbound marketing. The marketing campaign log requires a supervisor to review, sign and date the log. These records are maintained for a minimum of one year.

The Company maintains records of customer approval for the use of CPNI that include a copy of the notice and the customer's "opt-out" written notification. These records are maintained for a minimum of one year.

The Company requires that customers be authenticated at the beginning of all customer initiated calls, online transactions, or in-store visit. In store visits require a valid photo ID.

The Company maintains a log of unauthorized use of CPNI, where law enforcement is required to be notified. This includes the date of discovery, notification to law enforcement, description of the breach, circumstances of the breach and a supervisor's signature and date. This log is maintained for a minimum of two years.

